

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA
CHARLESTON DIVISION**

IN RE: ETHICON, INC.,
PELVIC REPAIR SYSTEMS
PRODUCTS LIABILITY LITIGATION

MDL NO. 2327

THIS DOCUMENT RELATES TO THE CIVIL ACTION NOS. LISTED ON THE ATTACHED EXHIBITS:

**JOINT MOTION TO DISMISS DEFENDANT
AMERICAN MEDICAL SYSTEMS, INC. WITH PREJUDICE**

Plaintiffs in the cases listed on the attached Exhibits A-G and defendant American Medical Systems, Inc. (“AMS”) advise the Court that they have compromised and settled all claims between them in these actions, including all counterclaims, cross-claims and third party claims. Accordingly, Plaintiffs and AMS jointly move the court to dismiss AMS as a defendant in these actions with prejudice, and terminate AMS from the docket in the actions, parties to bear their own costs. Other defendants remain in these actions, and plaintiffs will continue to pursue these actions against them.

Respectfully:

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Dated: _____

EXHIBIT A – HOLLIS WRIGHT & COUCH

CIVIL ACTION NUMBER (listed numerically in ascending order)	CASE NAME
2:14-CV-09221	Rosalee Slay v. Ethicon, Inc., Johnson & Johnson, American Medical Systems, Inc.

EXHIBIT B – LOCKRIDGE GRINDAL NAUEN

CIVIL ACTION NUMBER (listed numerically in ascending order)	CASE NAME
2:12-CV-09783	Regina Peltz, Stanley Peltz v. Ethicon, Inc., Johnson & Johnson, American Medical Systems, Inc.
2:14-CV-11838	Chloe Hendrickson, Dale Hendrickson v. Ethicon, Inc., Johnson & Johnson, American Medical Systems, Inc.

EXHIBIT C – SEEGER WEISS

CIVIL ACTION NUMBER (listed numerically in ascending order)	CASE NAME
2:13-CV-21840	Malinda Groce v. Ethicon, Inc., Johnson & Johnson, American Medical Systems, Inc.
2:13-CV-21845	Rhonda Hooten, Jerrell Hooten v. Ethicon, Inc., Johnson & Johnson, American Medical Systems, Inc.
2:13-CV-21848	Lupe Rivas v. Ethicon, Inc., Johnson & Johnson, American Medical Systems, Inc.

EXHIBIT D – THE SIMON LAW FIRM

CIVIL ACTION NUMBER (listed numerically in ascending order)	CASE NAME
2:12-CV-08575	Janet Drake, Kyle Drake v. Ethicon, Inc., Johnson & Johnson, American Medical Systems, Inc.
2:13-CV-03083	Kelly J. Webb v. Ethicon, Inc., Johnson & Johnson, American Medical Systems, Inc.
2:13-CV-03089	Mabel Jones v. Ethicon, Inc., Johnson & Johnson, American Medical Systems, Inc., C. R. Bard, Inc., Sofradim Production SAS, Tissue Science Laboratories Limited
2:13-CV-04832	Cynthia D. Hines, James Hines v. Ethicon, Inc., Johnson & Johnson, American Medical Systems, Inc.
2:13-CV-16593	Brenda Tucker, Mark Tucker v. Ethicon, Inc., Johnson & Johnson, American Medical Systems, Inc.
2:13-CV-22040	Janice McClurg, David McClurg v. Ethicon, Inc., Johnson & Johnson, American Medical Systems, Inc.

EXHIBIT E – TATE LAW GROUP

CIVIL ACTION NUMBER (listed numerically in ascending order)	CASE NAME
2:13-CV-02187	Courtney Brown, Jamie Brown v. Ethicon, Inc., Johnson & Johnson, American Medical Systems, Inc.
2:13-CV-24014	Frankie Cumbie, Jerry Winston Cumbie v. Ethicon, Inc., Johnson & Johnson, American Medical Systems, Inc.

EXHIBIT F – WRIGHT & SCHULTE

CIVIL ACTION NUMBER (listed numerically in ascending order)	CASE NAME
2:13-CV-11769	Paula Kravetz, Steven Kravetz v. Ethicon, Inc., Johnson & Johnson, American Medical Systems, Inc.
2:14-CV-00579	Waltraud Herr, Richard Herr v. Ethicon, Inc., Johnson & Johnson, American Medical Systems, Inc., Boston Scientific Corporation
2:14-CV-05160	Patricia Richardson, Mike Richardson v. Ethicon, Inc., Johnson & Johnson, American Medical Systems, Inc.
2:14-CV-05162	Erliene Shavers v. Ethicon, Inc., Johnson & Johnson, American Medical Systems, Inc.

EXHIBIT G – ZIMMERMAN REED

CIVIL ACTION NUMBER (listed numerically in ascending order)	CASE NAME
2:12-CV-08039	Peggy Godwin, Mark R. Godwin v. Ethicon, Inc., Johnson & Johnson, American Medical Systems, Inc.
2:13-CV-16028	Alice Hill, Andrew Hill v. Ethicon, Inc., Johnson & Johnson, American Medical Systems, Inc.
2:13-CV-22283	Jennifer Voelker, Chris Voelker v. Ethicon, Inc., Johnson & Johnson, American Medical Systems, Inc.
2:13-CV-23403	Veronica Snipes, Jeffrey Snipes v. Ethicon, Inc., Johnson & Johnson, American Medical Systems, Inc.
2:13-CV-27215	Ruby Flesher, Lawrence Flesher v. Ethicon, Inc., Johnson & Johnson, American Medical Systems, Inc.

CERTIFICATE OF SERVICE

I hereby certify that on August 16, 2016, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system which will send notification of such filing to the CM/ECF participants registered to receive service in these member cases.

/s/ Barbara R. Binis